

# Exhibit A



THE COUNCIL  
OF  
THE CITY OF NEW YORK

May 7, 2025

The Hon. Pam Bondi  
Attorney General  
US Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

Dear Attorney General Bondi:

We are a bipartisan coalition of New York City Council Members seeking your assistance in an urgent public safety matter.

We understand the Department of Justice (DOJ), under your direction, is already suing the state of New York for violating federal statutes by impeding communication between state and federal authorities on immigration enforcement. The lawsuit takes specific aim at the state “Green Light Law,” which allows non-citizens to obtain drivers licenses but limits access to their information stored on the state Department of Motor Vehicle database.

We ask the DOJ to expand this legal action to include New York City’s so-called “sanctuary city laws,” which shield criminal aliens from federal immigration authorities, place the public at risk and severely undermine efforts by the Department of Homeland Security (DHS) and our own law enforcement agencies to coordinate on issues of national security.

Filing a lawsuit against the City of New York to annul these statutes would be consistent with the memo you issued, dated February 5, 2025, which cites 8 U.S.C. § 1373(a): “(State and local jurisdictions) may not prohibit, or in any way restrict, any government entity or official from sending to, or receiving from, [federal immigration officers] information regarding the citizenship or immigration status, lawful or unlawful, of any individual,” and further states “The Department will also seek to take any appropriate enforcement action where state or local practices violate federal laws, regulations, or grant conditions.”

We believe the following New York City laws meet those criteria:

- **Local Law 62 of 2011**, which prevents the city from honoring any federal immigration detainer request unless it is backed up by a warrant issued by a federal judge and the subject of the request was convicted within the previous five years of a “serious crime” as defined by the legislation, or is on the terrorist watch list
- **Local Laws 22 and 23 of 2013 and Local Laws 58 and 59 of 2014**, which updated Local Law 62 of 2011, further limited the circumstances under which the New York City Police Department (NYPD) or the New York City Department of Corrections (DOC) could honor detainer requests and removed an Immigration and Customs Enforcement (ICE) field office at Rikers Island Correctional Facility.

(see reverse)

- **Local Law 221 of 2017**, which prohibits the use of any City resources – including property and information obtained on behalf of the City - to be used to work with federal immigration authorities.

A story in the *NY Post* detailing crimes by illegal migrants in New York City underscores the dire need for federal intervention on this matter. According to data the *Post* analyzed, 3,219 migrants staying in taxpayer-funded shelters were arrested a total of 4,884 times between Jan. 1, 2023, and Oct. 31, 2024, including 544 times for assault, 493 for grand larceny, 235 for robbery, 141 for sex crimes and three for murder. Under our “sanctuary city” laws, not only would local authorities have been required to ignore any lawful immigration detainees for these criminals, but they would also have been prohibited from even letting ICE know they have them in custody. As a result, many of these dangerous criminal aliens were released and allowed to continue to threaten the safety of our residents.

For years, we have sought to repeal these “sanctuary city” laws, including twice proposing a ballot referendum that would ask the voters to do so. But our efforts have been stonewalled by the same politicians and institutions that created and continue to support these reckless, ill-conceived policies.

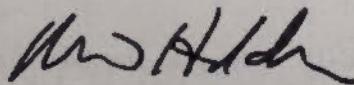
That is why we are asking for the DOJ to intervene and help keep New Yorkers safe.

Thank you for your time and consideration of this matter.

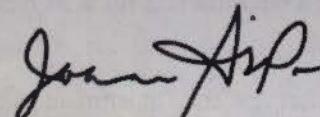
Respectfully submitted,



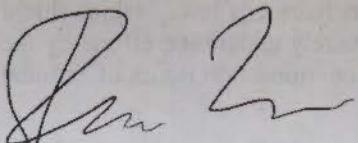
David M. Carr  
Council Member, 50th District



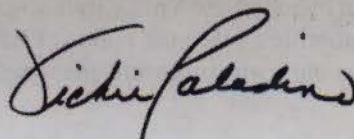
Robert F. Holden  
Co-Chair, Common Sense Caucus  
Council Member, 30th District



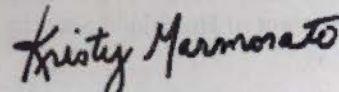
Joanne Ariola  
Co-Chair, Common Sense Caucus  
Minority Leader, 32nd District



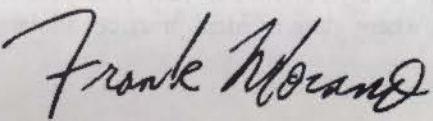
Inna Vernikov  
Council Member, 48th District



Vickie Paladino  
Council Member, 19th District



Kristy Marmorato  
Council Member, 13th District



Frank Morano  
Council Member-Elect, 51st District